

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOSHUA HU, *et al.*,

Plaintiffs,

v.

BMW OF NORTH AMERICA LLC, *et al.*,

Defendants.

Civil Action No. 18-4363 (KM)(JBC)

Motion Date: March 1, 2021

ELECTRONICALLY FILED

ORAL ARGUMENT REQUESTED

**DEFENDANT ROBERT BOSCH GMBH'S
NOTICE OF MOTION AND MOTION TO DISMISS PLAINTIFFS'
FIRST AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

CLEARY GOTTlieb STEEN & HAMILTON LLP

Jeffrey A. Rosenthal
CarminE D. Boccuzzi, Jr.
One Liberty Plaza
New York, NY 10006
(212) 225-2000

Matthew D. Slater
Alexis Collins
2112 Pennsylvania Ave., N.W.
Washington, D.C. 20037
(202) 974-1500

CRITCHLEY KINUM & DENOIA, LLC

Michael Critchley, Sr.
Amy Luria
75 Livingston Avenue
Roseland, NJ 07068
(973) 422-9200

Counsel for Defendant Robert Bosch GmbH

PLEASE TAKE NOTICE that, pursuant to Local Rule 7.1, on March 1, 2021 or at such other date as may be agreed upon or ordered, at the United States District Court for the District of New Jersey, located at the Frank R. Lautenberg Post Office and Courthouse, 2 Federal Square, Newark, New Jersey, Defendant Robert Bosch GmbH will and hereby does move this Court before the Honorable Kevin McNulty, U.S.D.J., to dismiss the claims against it in Plaintiffs' First Amended Consolidated Class Action Complaint and Demand for Jury Trial, ECF No. 65, for lack of personal jurisdiction.

PLEASE TAKE FURTHER NOTICE that this Motion is made pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, and is based on this Notice of Motion, accompanying Memorandum of Law, all pleadings and papers filed herein, oral argument, if any, Stipulation and Order at ECF No. 94, and any other matter that may be submitted at any hearing of this Motion. A proposed form of Order is also submitted.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Respectfully Submitted,

CLEARY GOTTlieb STEEN & HAMILTON LLP

Dated: December 16, 2020

By: /s/ Jeffrey A. Rosenthal

Jeffrey A. Rosenthal
Carmine D. Boccuzzi, Jr.
One Liberty Plaza
New York, NY 10006
Tel.: (212) 225-2000
Fax: (212) 225-2086
jrosenthal@cgsh.com
cboccuzzi@cgsh.com

Matthew D. Slater
Alexis Collins
2112 Pennsylvania Avenue NW
Washington, DC 20037
Tel.: (202) 974-1500
Fax: (202) 974-1999

mslater@cgsh.com
alcollins@cgsh.com

CRITCHLEY KINUM & DENOIA, LLC
Michael Critchley, Sr.
Amy Luria
75 Livingston Avenue
Roseland, NJ 07068
Tel.: (973) 422-9200
Fax: (973) 422-9700
mcritchley@critchleylaw.com
aluria@critchleylaw.com

Counsel for Defendant Robert Bosch GmbH